

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

**ASTORIA KING,  
individually and on  
behalf of those similarly  
situated,**

**Plaintiff,**

**vs.**

**THREE SISTERS  
ENTERTAINMENT, INC.,  
et al,**

**Defendants.**

**CIVIL ACTION  
1:22-cv-04235-LMM**

**CONSENT MOTION TO EXTEND DISCOVERY PERIOD**

Plaintiff Astoria King (“Plaintiff”), individually and on behalf of all others similarly situated, and Defendants Three Sister’s Entertainment, Inc. and Nianna Wright (“Defendants”), by and through their undersigned counsel, file this Motion to extend the Discovery period, showing this honorable Court as follows:

1. Plaintiff filed this civil action on October 24, 2022. [Doc. 1]. Defendants answered the Complaint on January 19, 2023 [Doc. 16].
2. On February 14, 2023, the Court adopted the parties’ Joint Preliminary Report and Discovery Plan, setting a four (4) month discovery period. [Doc. 19].
3. On June 7, 2023, the Parties filed a Consent Motion to Extend

Discovery Period and jointly requested that the discovery period be extended until September 19, 2023. [Doc. 23].

4. As stated in their June 7, 2023, Motion, the Parties were attempting to resolve the case without incurring additional costs and fees related to litigation. *Id.*

5. On June 8, 2023, the Court granted the Parties' June 7, 2023, Motion and extended the discovery period through September 19, 2023. [Doc. 24].

6. Since the Court's June 8, 2023, Order, the Parties continued to engage in settlement discussions and continued to discuss their respective positions, including the potential strengths and weaknesses that each side faces if the Parties continued to litigate this case.

7. The Parties have more recently concluded that further settlement negotiations at this time will not be productive. However, as mentioned in the Parties' June 7, 2023, Motion, the Parties had continued to try to resolve this case without incurring the additional costs related to litigation.

8. The Parties have worked together, and are continuing to work together, in litigating this case. The Parties had previously exchanged written discovery requests and are working together to complete written discovery. The Parties are working together to schedule and conduct a Rule 30(b)(6) deposition of

Defendant Three Sister's Entertainment, Inc. Both Parties, however, require additional time to complete discovery.

9. The Parties jointly request that the discovery period be extended by 45 days, from its existing cut-off date of September 19, 2023, through and including November 3, 2023.

10. This extension is needed because the Parties have been trying to be cost-effective as they explored a potential resolution to this case. Now that the Parties have reached an impasse in settlement discussions, the Parties need a brief extension to complete discovery and to fully develop the factual record in this case.

11. Furthermore, Plaintiff's counsel needs additional time to complete discovery as he is currently assisting a colleague with her cases while she is recovering from a surgery.

12. For the above and foregoing reasons, the Parties respectfully request a 45-day extension of the discovery period, and that all other pretrial deadlines be extended accordingly.

13. This motion is not brought for the purpose of delay, and the requested extension will not prejudice any party.

This 13th day of September, 2023.

Respectfully submitted,

**PLAINTIFF ASTORIA KING**

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